



Sean C. Koehler

PARTNER

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Sean is a Partner in the Litigation Department and a member of the firm's International Trade Compliance and Sanctions Practice Group.

Sean counsels clients on compliance with the International Traffic in Arms Regulations (ITAR), the Export Administration Regulations (EAR), U.S. trade sanctions regulations administered by the Office of Foreign Assets Control (OFAC), and the Committee on Foreign Investment in the United States (CFIUS) requirements. His experience in this area includes interfacing with government regulators; conducting internal investigations into potential export violations; authoring voluntary self-disclosures and directed disclosures to the U.S. government; program management of enterprise-wide compliance programs; developing corrective actions designed to address and prevent export violations; training and advising compliance personnel and in-house investigators; and performing quality control on voluntary self-disclosures prepared by in-house personnel.

Recently, Sean successfully conducted a series of investigations in collaboration with in-house counsel at a global company to systematically identify and remove user access permissions that gave foreign persons the ability to access ITAR technical data stored on IT systems. These investigations required close collaboration with IT, trade compliance, and business personnel, deep understanding of complex IT systems, and careful analysis of enormous amounts of data. Sean previously designed and managed the implementation of a best-in-class EAR and OFAC compliance program at a global electronics company, which led to the dismissal of a federal criminal investigation. Sean has also been seconded to a leading aerospace and defense contractor, where he conducted investigations, oversaw junior in-house investigators, and developed and implemented compliance enhancements as part of the company's continuous improvement program.

In his pro bono practice, Sean has helped sixteen Afghan nationals obtain asylum in the United States through the Operation Allies Welcome program.

Sean was a judicial law clerk to Judge Alvin W. Thompson of the U.S. District Court for the District of Connecticut and an intern for Chief Judge Loretta A. Preska of the U.S. District Court for the Southern District of New York. He received his J.D. *magna cum laude* from Fordham University School of Law and was presented with the Adele

Monaco Memorial Award, which honors a member of the graduating class who “made a positive impact on the lives of evening division students through the demonstration of compassion, courage, determination and commitment to public service.” Before law school, Sean earned a B.A. in Economics and English from Cornell University and an M.A. in Quantitative Methods from Columbia University.

Sean is Vice President of the Board of the New Haven Free Public Library Foundation.

Education

- Fordham University School of Law (J.D., 2012)
 - magna cum laude
- Columbia University (M.A., 2007)
- Cornell University (B.A., 2003)

Bar Admissions

- Connecticut
- New York

Publications

February 25, 2026

Applied Materials Enforcement Action: BIS Penalizes U.S. Company that Offshored Manufacturing to Avoid U.S. Export Requirements for Chinese Military End User and Entity List Party

May 1, 2023

Largest-Ever Penalty Ushers in New Era of BIS Enforcement

WorldECR

April 21, 2023

Commerce Imposes Largest-Ever Penalty for Violations Related to the Entity List, Foreign Direct Product Rule

December 15, 2022

OFAC Designates Rosbank as an SDN

September 23, 2022

David Ring and Sean Koehler Co-Author an Article on Changes to OEE Enforcement Policy and Voluntary Self-Disclosure Calculus

June 27, 2022

Uyghur Forced Labor Prevention Act Goes into Effect; Forced Labor Enforcement Task Force and CBP Issue Guidance to U.S. Importers on How to Comply

April 12, 2022

U.S. Imposes New Severe Economic Sanctions on Russia in Response to Atrocities in Ukraine

March 29, 2022

Summary of Recent OFAC Sanctions and BIS Export Controls on Russia, Belarus, and the Self-Declared

Donetsk and Luhansk People's Republics In Ukraine

August 10, 2021

Belarus Sanctions Update

June 5, 2019

U.S. Further Restricts Non-Family Travel and Movement of Non-Commercial Planes, Non-Cargo Vessels to Cuba

April 22, 2019

OFAC and the UN Urge Enhanced Trade Sanctions Controls for Maritime Supply Chain Actors, Including Banks and Insurers

August 3, 2018

U.S. Bureau of Industry and Security Updates Entity List with 44 Entities in China

May 21, 2018

U.S. Bureau of Industry and Security Updates Unverified List

December 16, 2015

Insurance News, December 2015

March 4, 2014

New Guidance on Providing Financial Services to Medical Marijuana Businesses